

IN THE UNITED STATES DISTRICT COURT DISTRICT OF DELAWARE

IRE LYLES,

PLAINTIFF,

V.

THE STATE OF DELAWARE,
DEPARTMENT OF JUSTICE,
ROSS FLOCKERTIE,
ALLISON ABESSINIO,
WILMINGTON POLICE DEPARTMENT,
DEFENDANTS.

CIVIL ACTION

18 - 173

IN RE: OF:

THE STATE OF DELAWARE,

V.

IRE LYLES

FILED

JAN 30 2018

JMS

U.S. DISTRICT COURT
DISTRICT OF DELAWAREINITIAL COMPLAINT UNDER 42 § 1983

THE ABOVE CAPTIONED LITIGANT IRE LYLES NOW COMES BEFORE THIS HONORABLE COURT UNDER THE PROVISIONS SET FORTH IN 42 § 1983 WITH CLAIMS OF CONSTITUTIONAL INFRINGEMENTS BY ALL OF THE ABOVE CAPTIONED DEFENDANTS. THESE CLAIMS INCLUDE BUT ARE NOT LIMITED TO MALICIOUS PROSECUTION IN VIOLATION OF FUNDAMENTAL FAIRNESS AND EQUAL PROTECTION OF LAW ON BEHALF OF DEPARTMENT OF JUSTICE, ROSS FLOCKERTIE AND ALLISON ABESSINIO. DEFENDANTS HAVE MALICIOUSLY OUTSIDE OF THE SCOPE OF THE LAW PURSUED PROSECUTION ON PLAINTIFF "LYLES" IN VIOLATION OF THE UNITED STATES CONSTITUTION AND DEFENDANTS HAVE BEEN PRESENTED WITH "GROSS" EVIDENCE IN SUPPORT OF LYLES LEGAL INNOCENCE. IN FACT THE STATE AGENTS HAVE WENT ABOVE AND BEYOND TO KEEP "LYLES" INCARCERATED WITH LEGAL PLEADINGS AND MOTIONS PRESENTED TO THE NCC SUPERIOR COURT AND DELIBERATELY PULLED FROM THE DOCKET TO PREVENT JUDGES FROM INTERVENTION. THESE DEFENDANTS WILL BE PURSUED IN THEIR PERSONAL CAPACITY AS WELL AS SOLE CLAIMS IN REGARD TO THEIR OFFICIAL CAPACITY. THE PLAINTIFF WILL PROVIDE A MOTION FOR FUTURE AMENDMENT OF THIS COMPLAINT DUE TO THE FACT HE IS CURRENTLY PRO SE AND MUST GATHER THE LEGAL MATERIALS

AND REQUIRED LEGAL AUTHORITIES FROM THE LAW LIBRARY AND
THE LAW LIBRARY PROCESS OR PROCEDURE WILL ONLY ALLOW HIM
TO ORDER LIMITED LAW AT ONE TIME PER WEEK.

WHEREFORE, THE PLAINTIFF ASK THIS HIGH COURT TO
FILE THE COMPLAINT AND ASSIGN A CIVIL ACTION NUMBER.

RELIEF WILL BE FURTHER STATED IN ACCORDANCE WITH
LEGAL GUIDELINES.

SUA SPONTE,



IBE LYLES ID: 00271768

N.Y.C.I

1301 E. 12TH STREET

WILMINGTON, DE 19802

Dated: 01-28-18

IM

IBE 4/1/85

SBI#

271768

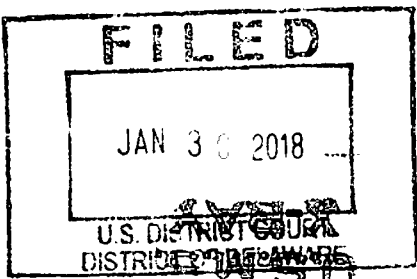
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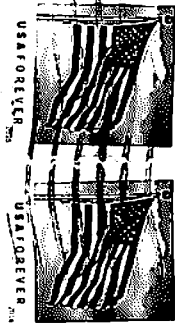
HOWARD R. YOUNG CORRECTIONAL INSTITUTION

P.O. BOX 9561

WILMINGTON, DELAWARE 19809



UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE
844 N. KINCAID ST.
WILM., DE. 19801



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